

REMARKS/ARGUMENTS

This Amendment is being filed in response to the Office Action of December 18, 2009. Reconsideration and allowance of the application in view of the amendments made above and the remarks to follow are respectfully requested.

Claims 1-20 are pending in the Application. Claims 1, 7, and 12 are independent claims. By means of the present amendment, the claims are amended to clarify their recitations.

In the Office Action, claims 1-20 are rejected under 35 U.S.C. §103(a) over U.S. Patent No. 6,182,116 to Namma ("Namma") in view of U.S. Patent No. 6,281,790 to Kimmel ("Kimmel"). It is respectfully submitted that claims 1-20 are allowable over Namma in view of Kimmel for at least the following reasons.

In the Office Action Response to the Arguments section, on page 3, starting at line 6, it is argued that the limitation "a master control device of the plurality of devises" does not mean that the master control device is one of the plurality of devises. This position is respectfully refuted, however, in the interest of advancing consideration and allowance of the present application, the Applicant has elected to amend independent claims 1, 7, and 12 to recite the following:

a master control device selected from the plurality of devices, the master control device comprising an embedded web server, each of the plurality of devices including a peer interface module and host software

As example of the plurality of devices having a peer interface module and host software is illustrated, for example, in the present application, FIG. 1. As illustrated, the master control

device (DVR0) is identical to the rest of the devices with its only distinguishing characteristic being the active presence of the embedded web server software.

As was previously argued, the virtual server apparatus 91 of Namma is a separate unique device distinct from the servers 92 and 93. The server apparatus 91 of Namma cannot perform the functions of the servers 92 and 93, such as filming or playing back video and transferring video data, and vice versa. The virtual server apparatus 91 of Namma does not produce image data without receiving it from one of the serves 92, 93.

As discussed above, claims 1, 7, and 12 are amended to clarify that the master control device is "selected from the plurality of devices" but that all of the plurality of devices (including the master control device) include a peer interface module, host software, and provide data directly to the web browser. Namma, does not do so because its server apparatus 91 is distinct.

It is respectfully submitted that the system of claim 1 is not anticipated or made obvious by the teachings of Namma in view of Kimmel. For example, Namma in view of Kimmel does not teach, disclose or suggest, a system that amongst other patentable elements, comprises (illustrative emphasis added) "a master control device selected from the plurality of devices, the master control device comprising an embedded web server, each of the plurality of devices including a peer interface module and host software; one or more linked devices selected from the plurality of devices and are controlled by said embedded web server of said master control device, the peer interface module of said linked devices communicates in a peer to peer manner with the peer interface module of said master control device for being controlled by said embedded web server; and a device

for operating a web browser for communicating with said embedded web server on said master control device in order to access said linked devices, wherein said web browser controls each of said linked devices indirectly through said embedded web server on said master control device and receives data directly from each of said plurality of devices that have been selected to provide the data" as recited in claim 1, and as similarly recited in each of claims 7 and 12.

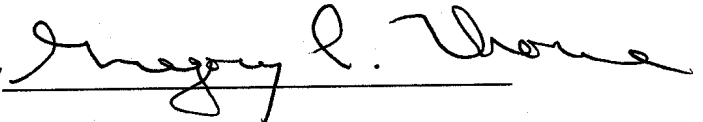
Kimmel does nothing to cure the deficiencies in Namma.

Based on the foregoing, the Applicant respectfully submits that independent claims 1, 7, and 12 are patentable over Namma in view of Kimmel and notice to this effect is earnestly solicited. Claims 2-6, 8-11, and 13-20 respectively depend from one of claims 1, 7, and 12 and accordingly are allowable for at least this reason as well as for the separately patentable elements contained in each of the claims. Accordingly, separate consideration of each of the dependent claims is respectfully requested.

In addition, Applicant denies any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicant reserves the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

Applicant has made a diligent and sincere effort to place this application in condition for immediate allowance and notice to this effect is earnestly solicited.

Respectfully submitted,

By 

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March 18, 2010

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